



SDMS Doc ID 2030994



2030994

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

March 8, 1995

Robert Williams  
Deputy Director of Public Works  
Calaveras County  
891 Mountain Ranch Road  
San Andreas, CA 95249

Dear Mr. Williams:

Per our discussion, I am forwarding a comparison of two additional remediation options for the Diamond XX Asbestos Site. As you recall, the recommended remediation option consisted of upgrading and double chip sealing most of the existing roadways. The estimated cost was \$ 600,000. Remediation option (1) was suggested as a potential remedy by the Diamond XX community. Remediation option (2) was discussed at the PRP meeting, but was somehow forgotten. Based on several factors, I believe that option (2) has several advantages over option (1). These factors include beneficial use (or recycling) of waste materials, on-site versus off-site activities, thereby reducing potential traffic and dust problems, improved road surfaces and lower cost.

EPA would reduce overall remediation costs by providing training to contractors. This would include OSHA 40-hour Health & Safety Training for road maintenance workers and truck drivers. Further cost savings would be achieved if Boise Cascade, George Reed and the County provided equipment, materials and labor.

(1) Remediation through removal and off-site disposal of asbestos-containing aggregate.

The remediation consists of excavating and loading road aggregate onto end-dump trucks and hauling the material to the California Asbestos Monofill (CAM) disposal facility. EPA would assume "Generator" responsibilities. Under Cal-EPA regulations, the federal government, as a generator, would be exempt from paying State generator and land disposal taxes and fees. The cost savings would be \$26.82 per ton. EPA would also apply for variances from State registered hazardous hauler and manifesting requirements. Significant savings would be achieved by using non-registered trucks and end-dumps. EPA is currently negotiating with CAM to reduce the disposal costs to \$ 4.00 per ton. Even though EPA would obtain these variances and exemptions from administrative requirements, the contractors would be required to comply with the substantive requirements (i.e., health and safety training, truck maintenance, placards, shipping papers, etc.).

The remediation costs for option (1) are estimated as follows:

- 1) Disposal: \$ 4.00 per ton
- 1) Grading: \$ .12 per square foot
- 3) Transportation: \$ 2.50 per ton

- 1) 23,000 tons x \$ 4.00 = \$ 92,000
- 2) 1,181,561 square feet x \$ .12 = \$ 142,000
- 3) 23,000 tons x \$ 2.50 = \$ 57,500

Total Estimated Cost = \$ 291,500

(2) Remediation through consolidation and encapsulation of asbestos-containing aggregate.

The remediation consists of moving and consolidating road aggregate at the eight roadways listed below. Road aggregate would be removed from the other roadways and placed on the eight roadways to create a 4 inch rock base. The total tonnage of rock is approx. 23,000. These eight roadways have an existing tonnage of 17,545. To create a 4 inch base, an additional 6,085 tons of rock would be borrowed from the other roadways. The eight roadways would be encapsulated by application of a double oil and chip seal. By this method, the existing asbestos rock would be used (or recycled) for beneficial use rather than disposal.

The remediation costs for option (2) are estimated as follows:

- 1) Double chip sealing: \$ .20 per square foot
- 2) Grading: \$ .12 per square foot
- 3) Transportation: \$ 2.50 per ton

- 1) 910,701 sq ft x \$ .20 = \$ 182,140
- 2) 270,860 sq ft (1,181,561 - 910,701) x \$ .12 = \$ 32,503
- 3) 6,085 tons x \$ 2.50 = \$ 15,212

Total Estimated Cost = \$ 229,855

ROADWAYS	SURF. AREA (sq ft)	EXISTING ROCK (tons)	REQUIRED ROCK (tons)
Chuckwagon	219,164	6,281	91
Stage Coach	282,375	4,393	2,578
Conestoga	88,897	823	1,372
Horseshoe	55,528	733	638
Pommell	83,037	1,298	752
Buckboard	76,420	1,919	153
Singletree	48,080	1,039	148
Wagon Wheel	57,200	1,059	353
TOTALS	910,701	17,545	6,085

A PRP group meeting should be held within two weeks to finalize the remedy selection and begin planning the work activities. Work activities should be performed during the early spring, when natural moisture in the roadbed would minimize airborne dust emissions. The PRP group must develop a workplan and schedule which must be approved by EPA prior to any work activities. All correspondence sent by individual PRP representatives should be copied to the other representatives and EPA so that everyone is kept informed. The County should be coordinating all meetings, schedules and correspondence so that the momentum of the negotiations and planning does not falter.

If you have any questions or comments, please call me at (415) 744-2286.

Sincerely,



Daniel M. Shane  
On-Scene Coordinator  
Emergency Response Section

Enclosures:

1. Letter from Diamond XX dated Feb 20, 1995
2. Letter from Calaveras County dated Feb. 21, 1995

cc: Diana Fischer/Pat Sousa, Diamond XX Subdivision  
James Jackson, Boise Cascade  
Chris Amend, George Reed  
Steve Calanog, Superfund Enforcement  
Laurie Williams, Office of Regional Counsel  
Vicki Rosen, Community Relations



BERNARD T. PEDERSEN  
DIRECTOR

# CALAVERAS COUNTY DEPARTMENT OF PUBLIC WORKS

GOVERNMENT CENTER ♦ 891 MOUNTAIN RANCH ROAD ♦ SAN ANDREAS, CA 95249

ADMINISTRATION  
(209) 754-6402

SOLID WASTE  
(209) 754-6403

SURVEYOR  
(209) 754-6416

February 21, 1995

Mr. Dan Shane  
Federal On-Scene Coordinator  
EPA Emergency Response Section (H-8-3)  
75 Hawthorne Street  
San Francisco, CA 94105

RE: DIAMOND TWENTY - QUANTITY OF EXISTING ROCK

Dear Dan:

Per your request, I am forwarding the quantity of existing rock within the roadways of Diamond Twenty. The total tonnage is 22,991 tons. The figure is based on the square footages and depths of existing rock from the spreadsheet we had previously prepared. A copy is enclosed showing each road segments contribution.

Hope this provides what you need. Should you have any questions, please call me at (209) 754-6402.

Sincerely,

Robert L. Williams, P.E.  
Deputy Director of Public Works  
R.C.E. #33689

RLW/jw  
enclosures (3)  
1214.csa6



## DIAMOND XX A/B QUANTITIES

(SOUTH SIDE)

ROAD	SEG	LENGTH (feet)	WIDTH (feet)	SURF. AREA (sq. ft)	DEPTH (inches)	ADDITL REQD	TONS A/B REQUIRED	ADD FOR 22' WIDTH(TONS)
HORSESHOE DRIVE	A	865	30	A/C	N/A		0	0
HORSESHOE DRIVE	B	965	17.5	A/C	N/A		0	0
		1,830					0	0
HORSESHOE WAY	A	230	13.5	A/C	N/A		0	0
HORSESHOE WAY	B	1,450	13.8	20,010	1.5	185 +2.5	309	294
HORSESHOE WAY	C	3,010	11.8	35,518	2.5	548 +1.5	329	758
		4,690		55,528			638	1,052
TUGG WAY	A	380	18	6,840	3	127 +1	42	38
TUGG WAY	B	1,265	13	16,445	1.5	152 +2.5	254	281
		1,645		23,285			296	319
POMMELL WAY	A	1,425	15	21,375	1.5	198 +2.5	330	246
POMMELL WAY	B	525	8.5	4,462	1.5	41 +2.5	69	175
POMMELL WAY	C	1,250	12	1,500	3	28 +1.0	9	309
		5,570	10	55,700	3	1031 +1.0	344	1,650
		8,770		63,037			752	2,380
COLT LANE		775	10	7,750	2	96 +2	96	230
SUBTOTAL		17,710		169,600		2406	1,782	3,981

TONS OF ROCK  
EXIST'G

# DIAMOND XX A/B QUANTITIES

(NORTH SIDE)

ROAD	SEG	LENGTH (feet)	WIDTH (feet)	SURF. AREA (sq. ft)	DEPTH (inches)	ADDITL REQD	TONS A/B REQUIRED	ADD FOR 22' WIDTH(TONS)
HORSESHOE DRIVE	C	625	23	A/C	N/A		0	0
HORSESHOE DRIVE	D	1,200	19	A/C	N/A		0	0
		1,825						
STAGECOACH ROAD	A	5,290	17	89,930	2	1,110 +2	1,110	653
		1,355	10	13,550	2	167 +2	167	401
STAGECOACH ROAD	B	250	18	A/C	N/A		0	25
STAGECOACH ROAD	C	1,825	12	21,900	3	406 +1	135	451
STAGECOACH ROAD	D	2,065	15	30,975	4	765 +0	0	357
STAGECOACH ROAD	E	6,195	12	74,340	2.5	1,147 +1.5	688	1,530
		3,230	16	51,680	2.5	798 +1.5	478	479
		300	12	A/C	N/A		0	74
		20,510		282,375			2,578	3,970
SULKEY COURT		4,015	11	44,165	2	545 +2	545	1,090
CONESTOGA TRAIL	A	3,225	18.2	A/C	N/A		0	303
CONESTOGA TRAIL	B	6,585	13.5	88,897	1.5	823 +2.5	1,372	1,382
		9,810		88,897			1,372	1,685
CHUCKWAGON DRIVE	A	1,030	14.3	14,729	3	213 +1	91	196
		190	15.8	A/C	N/A		0	29
CHUCKWAGON DRIVE	B	715	15	10,725	4.5	298 +0	0	124
CHUCKWAGON DRIVE	C	2,900	15	43,500	4	1,074 +0	0	501
CHUCKWAGON DRIVE	D	7,740	17	131,580	5	4,061 +0	0	956
CHUCKWAGON DRIVE	E	1,242	15	18,630	5	575 +0	0	215
		13,817		219,164			91	2,021
HUB COURT		1,080	15	16,200	2	200 +2	200	187
SUBTOTAL		51,057		650,801		12,242	4,786	8,953

## DIAMOND XX A/B QUANTITIES

(NORTH SIDE)

ROAD	SEG	LENGTH (feet)	WIDTH (feet)	SURF. AREA (sq. ft)	DEPTH (inches)	ADDITL REQD	TONS A/B REQUIRED	ADD FOR 22' WIDTH(TONS)
CANTLE ROAD		1,925	13.7	26,372	3	468 +1	163	395
		850	13.7	11,645	1	72 3	215	174
		2,775		38,017			378	569
BUCKBOARD DRIVE	A	4,280	14	59,920	4.5	1,664 +0	0	845
BUCKBOARD DRIVE	B	1,650	10	16,500	2.5	255 +1.5	153	489
		5,930		76,420			153	1,334
SINGLETREE DRIVE	A	790	18	A/C	N/A		0	78
SINGLETREE DRIVE	B	3,005	16	48,080	3.5	1,039 +.5	148	445
		3,795		48,080			148	523
WAGON WHEEL		3,575	16	57,200	3	1,059 +1	353	530
SPUR COURT		515	12.7	6,540	3.5	141 +.5	20	118
SURREY LANE		3,845	12.4	47,678	5	1,472 0	0	911
BRITCHEN DRIVE		5,815	15	87,225	4	2,154 0	0	1,005
SUBTOTAL		26,250		361,160		8,343	1,052	4,990
GRAND TOTAL		95,017		1,181,561		22,991	7,620	17,924

DIA XX



P.O. Box 507  
Copperopolis, Ca. 95228  
February 20, 1995

Dan Shane, On - Scene Coordinater  
U.S. Environmental Protection Agency  
75 Hawthorne St. [ H--1--1 ]  
San Francisco, Ca. 94105-3901

Re: Diamond Twenty Roads

Dear Mr. Shane;

I would like to thank you and Steve Calanog for forwarding copies of letters from Boise Cascade and George Reed Inc. dated December, 1994. It's too bad the Calaveras County Public Works Department didn't see fit to copy either of us.

It's necessary that we soon come to some agreement / compromise in this situation of the Diamond XX roads. In response to the commitments offered by Boise Cascade and George Reed Inc., we would like to offer the following; as suggested at the two meetings by Mr. Chris Amend, Project Manager for George Reed Inc., remove the serpentine base rock, clean out the ditches and leave the roads with a minimum of 3% slope [to be paid for by all other P.R.P.'s]. The homeowners then would be responsible for construction of the roads. We already proposed this to Steve Calanog in our phone conversation on February 6, 1995.

The Diamond XX property owners request written clarification of the position of Calaveras County's involvement in the negotiations. Is the county at the table as a P.R.P. with the same status and responsibilities as the property owners, Boise and Reed or are they at the table as an overseer for our C.S.A.? Also, have other P.R.P.'s been added?

Dan, while there is moisture in the roads it is necessary for this job to progress. Spring is only a month away and there is still no solution .It would appear the County is dragging its feet. We're most anxious to reach a settlement and get our roads repaired. This winter has been very hard on our roads and work must be started soon. What is being done to move this along?

Respectfully yours,

*Diana Fischer*

Diana Fischer, Diamond XX , Property Owners Representative.

*Patricia Sousa*

Patricia Sousa, Diamond Twenty, Homeowners' Representative